

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DAVID A. JOFFE,

Plaintiff,

v.

KING & SPALDING LLP,

Defendant.

Case No. 17-cv-3392 (VEC) (SDA)

**PLAINTIFF'S NOTICE OF MOTION TO EXCLUDE THE REPORT AND TESTIMONY
OF DEFENDANT'S LEGAL ETHICS EXPERT BRUCE A. GREEN**

PLEASE TAKE NOTICE THAT, upon the Memorandum of Law in Support of Plaintiff's Motion to Exclude the Report and Testimony of Defendant's Legal Ethics Expert Bruce A. Green; and the accompanying Declaration of David A. Joffe and the exhibits attached thereto, the undersigned respectfully moves this Court, before the Honorable Valerie E. Caproni, United States District Court, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and time to be designated by the Court, for an Order excluding the expert report and testimony of Defendant's legal ethics expert Bruce A. Green in their entirety pursuant to Federal Rules of Evidence 401, 403, and 702; and granting such other relief as the Court deems proper.

Dated: January 16, 2019

Respectfully submitted,

By: /s/ David A. Joffe
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